

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KENNETH J. TAGGART,

Debtor/Plaintiff,

v.

AJX MORTGAGE TRUST I, A DELAWARE
TRUST, WILMINGTON SAVINGS FUND
SOCIETY, FSB, TRUSTEE; GREGORY
FUNDING, LLC; AND GREAT AJAX
OPERATING PARTNERSHIP, LP,

Defendants

CHAPTER 11 PROCEEDING

Case No. 21-12476-AMC

Adversary No. 22-00019-AMC

**MOTION TO DISMISS
ADVERSARY COMPLAINT AND
QUIET TITLE ACTION WITH
PREJUDICE**

Defendants AJX Mortgage Trust I, a Delaware Trust, Wilmington Savings Fund Society, FSB, Trustee (“AJX Mortgage”), Gregory Funding, LLC (“GF”), and Great Ajax Operating Partnership, LP (“Great Ajax”) (collectively, “Defendants”), by and through their undersigned counsel, hereby move, pursuant to Fed. R. Bankr. P. 7012 and Fed. R. Civ. P. 12(b)(6), to dismiss the adversary complaint (the “Complaint”) filed by Plaintiff/Debtor Kenneth J. Taggart (“Plaintiff” or “Taggart”), with prejudice. The grounds for this Motion are set forth in the accompanying Memorandum of Law, which is incorporated herein by reference.

Respectfully submitted,

Dated: March 29, 2022

/s/ Jill Manuel-Coughlin

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